

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

CHERYL O'TOOLE

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_

(c) Attorney's (Firm Name, Address, Telephone Number and Email Address)

Craig Thor Kimmel, Esquire  
Kimmel & Silverman, P.C.  
30 E. Butler Pike  
Ambler, PA 19002  
(215) 540-8888

**DEFENDANTS**

NCO FINANCIAL SYSTEMS, INC.

County of Residence of First Listed Defendant \_\_\_\_\_

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                            |                            |  |                            |                            |
|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
|   | PTF                        | DEF                        |  | PTF                        | DEF                        |
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation   | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 U.S.C SECTION 1692

Brief description of cause:

Fair Debt Collection Practices Act

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S)**

(See instructions):

JUDGE

DOCKET NUMBER

Explanation:

10-31-11

DATE

SIGNATURE OF ATTORNEY OF RECORD

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 33 Glenner St. Cranston, RI 02920

Address of Defendant: 507 Prudential Road, Harsham, PA 19044

Place of Accident, Incident or Transaction: \_\_\_\_\_  
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?

Yes ☐ No ☒

2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?

Yes ☐ No ☒

3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?

Yes ☐ No ☒

4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?

Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations

7. ☐ Civil Rights

8. ☐ Habeas Corpus

9. ☐ Securities Act(s) Cases

10. ☐ Social Security Review Cases

11. ☒ All other Federal Question Cases § 15 U.S.C § 1692  
(Please specify)

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts

2. ☐ Airplane Personal Injury

3. ☐ Assault, Defamation

4. ☐ Marine Personal Injury

5. ☐ Motor Vehicle Personal Injury

6. ☐ Other Personal Injury (Please specify)

7. ☐ Products Liability

8. ☐ Products Liability — Asbestos

9. ☐ All other Diversity Cases

(Please specify)

### ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Craig Ther Kimmel, counsel of record do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

☐ Relief other than monetary damages is sought.

DATE: 10-31-11

Craig Ther Kimmel  
Attorney-at-Law

57100  
Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 10-31-11

Craig Ther Kimmel  
Attorney-at-Law

57100  
Attorney I.D.#

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

Cheryl O'Toole

v.

NCO Financial Systems, Inc.

CIVIL ACTION

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ☒
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( )

10-31-11

Date

Craig Thor Kimmel

Attorney-at-law

Cheryl O'Toole

Attorney for

215-540-8888

Telephone

877-788-2864

FAX Number

kimmel@creditlaw.com

E-Mail Address

1 UNITED STATES DISTRICT COURT  
2 FOR THE  
3 EASTERN DISTRICT OF PENNSYLVANIA

4 CHERYL O'TOOLE, )

5 Plaintiff )

6 v. )

7 NCO FINANCIAL SYSTEMS, INC., )

8 Defendant )

) Case No.:

) COMPLAINT AND DEMAND FOR  
) JURY TRIAL

) (Unlawful Debt Collection Practices)

9  
10 **COMPLAINT**

11 CHERYL O'TOOLE ("Plaintiff"), by and through her attorneys, KIMMEL &  
12 SILVERMAN, P.C., alleges the following against NCO FINANCIAL SYSTEMS, INC.  
13 ("Defendant"):

14  
15 **INTRODUCTION**

16 1. Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, 15  
17 U.S.C. § 1692 *et seq.* ("FDCPA").

18 **JURISDICTION AND VENUE**

19 2. Jurisdiction of this court arises pursuant to 15 U.S.C. § 1692k(d), which states  
20 that such actions may be brought and heard before "any appropriate United States district court  
21 without regard to the amount in controversy," and 28 U.S.C. § 1331 grants this court original  
22 jurisdiction of all civil actions arising under the laws of the United States.

23 3. Defendant has its corporate headquarters in the Commonwealth of Pennsylvania  
24 and as such, personal jurisdiction is established.

25 4. Venue is proper pursuant to 28 U.S.C. § 1391(b)(1).

**PARTIES**

5. Plaintiff is a natural person residing in Cranston, Rhode Island.

6. Plaintiff is a “consumer” as that term is defined by 15 U.S.C. §1692a(3).

7. Defendant is a national debt collection company with its corporate headquarters located at 507 Prudential Road, Horsham, PA 19044.

8. Defendant is a “debt collector” as that term is defined by 15 U.S.C. § 1692a(6), and repeatedly contacted Plaintiff in an attempt to collect a debt.

9. Defendant acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

**PRELIMINARY STATEMENT**

10. The Fair Debt Collection Practices Act (“FDCPA”) is a comprehensive statute, which prohibits a catalog of activities in connection with the collection of debts by third parties. See 15 U.S.C. § 1692 *et seq.* The FDCPA imposes civil liability on any person or entity that violates its provisions, and establishes general standards of debt collector conduct, defines abuse, and provides for specific consumer rights. 15 U.S.C. § 1692k.

11. The operative provisions of the FDCPA declare certain rights to be provided to or claimed by debtors, forbid deceitful and misleading practices, prohibit harassing and abusive tactics, and proscribe unfair or unconscionable conduct, both generally and in a specific list of disapproved practices.

12. In particular, the FDCPA broadly enumerates several practices considered contrary to its stated purpose, and forbids debt collectors from taking such action. The substantive heart of the FDCPA lies in three broad prohibitions. First, a “debt collector may not engage in any conduct the natural consequence of which is to harass, oppress, or abuse any

1 person in connection with the collection of a debt.” 15 U.S.C. § 1692d. Second, a “debt  
2 collector may not use any false, deceptive, or misleading representation or means in connection  
3 with the collection of any debt.” 15 U.S.C. § 1692e. And third, a “debt collector may not use  
4 unfair or unconscionable means to collect or attempt to collect any debt.” 15 U.S.C. § 1692f.  
5 The FDCPA is designed to protect consumers from unscrupulous collectors, whether or not there  
6 exists a valid debt, broadly prohibits unfair or unconscionable collection methods, conduct which  
7 harasses, oppresses or abuses any debtor, and any false, deceptive or misleading statements in  
8 connection with the collection of a debt.  
9

10 13. In enacting the FDCPA, the United States Congress found that “[t]here is  
11 abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many  
12 debt collectors,” which “contribute to the number of personal bankruptcies, to marital instability,  
13 to the loss of jobs, and to invasions of individual privacy.” 15 U.S.C. § 1692a. Congress  
14 additionally found existing laws and procedures for redressing debt collection injuries to be  
15 inadequate to protect consumers. 15 U.S.C. § 1692b.

16 14. Congress enacted the FDCPA to regulate the collection of consumer debts by debt  
17 collectors. The express purposes of the FDCPA are to “eliminate abusive debt collection  
18 practices by debt collectors, to insure that debt collectors who refrain from using abusive debt  
19 collection practices are not competitively disadvantaged, and to promote consistent State action  
20 to protect consumers against debt collection abuses.” 15 U.S.C. § 1692e.  
21  
22  
23  
24  
25



**FACTUAL ALLEGATIONS**

16. At all pertinent times hereto, Defendant was hired to collect a consumer debt and attempted to collect that debt from Plaintiff.

17. The debt arose out of transactions that were primarily for personal, family, or household purposes.

18. Beginning in or around May 2011, and continuing through September 2011, Defendant continuously and repeatedly contacted Plaintiff on her cellular telephone in an attempt to collect a debt.

19. At first, Defendant called and left multiple messages on Plaintiff's voicemail in its attempts to collect the alleged debt.

20. However, Defendant did not send Plaintiff notification of her rights to dispute the debt and/or request verification of the debt until on or after June 24, 2011. See Exhibit A, Defendant's June 24, 2011, correspondence to Plaintiff.

21. Around this same time, Plaintiff spoke with Defendant and demanded that Defendant stop calling her about this debt.

22. It was inconvenient for Plaintiff to receive Defendant's collection calls to her cellular phone, as she carried her cellular phone with her at all times, including while she was at work, and the collection calls disrupted her daily life activities.

23. Despite Plaintiff's unambiguous directive to cease contact by cellular telephone, Defendant continued to do so on a repetitive and continuous basis.

24. For more than two (2) months, Defendant contacted Plaintiff nearly on a daily basis.

25. On days calls were received, at least two (2) were received, sometimes as many

1 as four (4) were received.

2 26. Defendant intended to harass Plaintiff in a systematic fashion, knowing that such  
3 contact was unwanted and knowing that disregard of her instructions would cause injury, stress,  
4 fear and humiliation, but would substantially increase the likelihood of the debt being paid.

5 27. The repetitive calls to Plaintiff were intended by Defendant to be disturbing,  
6 harassing, and an invasion of privacy.

### 7 CONSTRUCTION OF APPLICABLE LAW

8 28. The FDCPA is a strict liability statute. Taylor v. Perrin, Landry, deLaunay &  
9 Durand, 103 F.3d 1232 (5th Cir. 1997). "Because the Act imposes strict liability, a consumer  
10 need not show intentional conduct by the debt collector to be entitled to damages." Russell v.  
11 Equifax A.R.S., 74 F. 3d 30 (2d Cir. 1996); see also Gearing v. Check Brokerage Corp., 233  
12 F.3d 469 (7th Cir. 2000) (holding unintentional misrepresentation of debt collector's legal status  
13 violated FDCPA); Clomon v. Jackson, 988 F. 2d 1314 (2d Cir. 1993).

14 29. The FDCPA is a remedial statute, and therefore must be construed liberally in  
15 favor of the debtor. Sprinkle v. SB&C Ltd., 472 F. Supp. 2d 1235 (W.D. Wash. 2006). The  
16 remedial nature of the FDCPA requires that courts interpret it liberally. Clark v. Capital Credit  
17 & Collection Services, Inc., 460 F. 3d 1162 (9th Cir. 2006). "Because the FDCPA, like the  
18 Truth in Lending Act (TILA) 15 U.S.C §1601 *et seq.*, is a remedial statute, it should be  
19 construed liberally in favor of the consumer." Johnson v. Riddle, 305 F. 3d 1107 (10th Cir.  
20 2002).

21 30. The FDCPA is to be interpreted in accordance with the "least sophisticated"  
22 consumer standard. See Jeter v. Credit Bureau, Inc., 760 F.2d 1168 (11th Cir. 1985); Graziano  
23 v. Harrison, 950 F. 2d 107 (3<sup>rd</sup> Cir. 1991); Swanson v. Southern Oregon Credit Service, Inc.,  
24



1 869 F.2d 1222 (9th Cir. 1988). The FDCPA was not “made for the protection of experts, but for  
2 the public - that vast multitude which includes the ignorant, the unthinking, and the credulous,  
3 and the fact that a false statement may be obviously false to those who are trained and  
4 experienced does not change its character, nor take away its power to deceive others less  
5 experienced.” Id. The least sophisticated consumer standard serves a dual purpose in that it  
6 ensures protection of all consumers, even naive and trusting, against deceptive collection  
7 practices, and protects collectors against liability for bizarre or idiosyncratic interpretations of  
8 collection notices. Clomon, 988 F. 2d at 1318.

9  
10 **COUNT I**  
11 **DEFENDANT VIOLATED THE**  
12 **FAIR DEBT COLLECTION PRACTICES ACT**

13 31. In its actions to collect a debt, Defendant violated the FDCPA in one or more of  
14 the following ways:

- 15 a. Defendant violated the FDCPA generally;
- 16 b. Defendant violated §1692c(a)(1) of the FDCPA when it communicated with  
17 Plaintiff at a time or place that it knew or should have known was  
18 inconvenient;
- 19 c. Defendant violated §1692d of the FDCPA when it harassed, oppressed or  
20 abused Plaintiff in connection with the collection of a debt;
- 21 d. Defendant violated §1692d(5) of the FDCPA when it caused Plaintiff's  
22 telephone to ring repeatedly or continuously with the intent to annoy Plaintiff;
- 23 e. Defendant violated §1692f of the FDCPA when it used unfair and  
24 unconscionable means in connection with the collection of a debt; and
- 25 f. Defendant violated §1692g(a) when it failed to send Plaintiff the required

1 notice regarding her rights under the FDCPA within five days of its initial  
2 communication with Plaintiff.

3 WHEREFORE, Plaintiff, CHERYL O'TOOLE, respectfully prays for a judgment as  
4 follows:


- 5 a. All actual damages suffered pursuant to 15 U.S.C. § 1692k(a)(1);  
6 b. Statutory damages of \$1,000.00 for the violation of the FDCPA pursuant to  
7 15 U.S.C. § 1692k(a)(2)(A);  
8 c. All reasonable attorneys' fees, witness fees, court costs and other litigation  
9 costs incurred by Plaintiff pursuant to 15 U.S.C. § 1693k(a)(3); and  
10 d. Any other relief deemed appropriate by this Honorable Court.

11 **DEMAND FOR JURY TRIAL**

12 PLEASE TAKE NOTICE that Plaintiff, CHERYL O'TOOLE, demands a jury trial in  
13 this case.

14  
15  
16 RESPECTFULLY SUBMITTED,

17  
18 Date: 10-31-11

19 By:   
20 Craig Thor Kimmel  
21 Attorney ID No. 57100  
22 Tara L. Patterson  
23 Attorney ID No. 88343  
24 Kimmel & Silverman, P.C.  
25 30 E. Butler Pike  
Ambler, PA 19002  
Phone: (215) 540-8888  
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Email: [kimmel@creditlaw.com](mailto:kimmel@creditlaw.com)  
Email: [tpatterson@creditlaw.com](mailto:tpatterson@creditlaw.com)

PO Box 12100  
DEPT 64  
Trenton, NJ 08650



## NCO FINANCIAL SYSTEMS, INC

4740 Baxter Road  
Virginia Beach, VA 23462

OFFICE HOURS(ET):  
8AM-10:30PM MON THRU THURSDAY  
8AM-9PM FRIDAY  
8AM-5PM SATURDAY  
2PM-9PM SUNDAY  
Jun 24, 2011



462-57



5199VK  
CHERYL OTOOLE

CREDITOR: Credit One Bank, N.A.  
ACCOUNT # 5641  
REFERENCE #: 5199VK  
TOTAL BALANCE : \$ 398.63  
MINIMUM PAYMENT AMOUNT: \$ 125.00

Dear CHERYL OTOOLE:

Please be advised that NCO Financial Systems, Inc. has been requested by Credit One Bank, N.A. to assist them in collection of the above minimum payment amount.

You may contact us at 1-877-825-3242 if you have any questions or if you would like to discuss this account further. Calls to or from this company may be monitored or recorded for quality assurance.

Please include the above account number on your check or money order and enclose the bottom portion of this letter, or a copy thereof, with your payment to insure proper credit. You may also make your payment online, at [www.creditonebank.com](http://www.creditonebank.com).

Unless you notify this office within thirty (30) days after receipt of this notice, that you dispute the validity of the debt, or any portion thereof, the debt will be assumed to be valid by this office. If you notify this office in writing within the thirty (30) day period after receiving this notice that the debt, or any portion thereof, is disputed, this office will obtain verification of the debt or a copy of a judgment against you and a copy of such verification or judgment will be mailed to you by this office. If you send this office a written request within the thirty (30) day period after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

This is an attempt to collect a debt. Any information obtained will be used for that purpose. This is a communication from a debt collector.

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT (MAKE SURE ADDRESS SHOWS THROUGH WINDOW)

Account #	Minimum Payment Amount
5641	\$ 125.00

CHERYL OTOOLE  
Payment Amount

\$

**Check here if your address or phone number has changed and provide the new information below.**

**Make Payment To:**



Payment Services  
PO Box 60500  
City of Industry CA 91716-0500



57

0164005199VK00000000000000000000000000398633

NCOP B